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 Romie Semenza and Lawrence J. Semenza, Ltd.*

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiffs,

v.

LAWRENCE J. SEMENZA II;
 ROMIE SEMENZA; LAWRENCE J.
 SEMENZA, LTD.; PHILIPPE SCHAAD;
 SHOOTING GALLERY
 PUBLICATIONS, LLC; TESLA, INC.,

Defendants.

CASE NO.: 2:22-cv-02059-APG-DJA

**AMENDED STIPULATION AND
 ORDER TO EXTEND DEADLINES
 RELATED TO THE UNITED
 STATES' MOTION FOR
 SANCTIONS AND
 MEMORANDUM IN SUPPORT
 (FIRST REQUEST)**

Defendants Lawrence J. Semenza II and Romie Semenza ("Semenza Defendants"), Defendants Phillippe Schaad and Shooting Gallery Publications, LLC ("Schaad Defendants") (collectively "Defendants"), and Plaintiff the United States of America ("Plaintiff") (collectively, the "Parties") respectfully stipulate to extend the deadlines as follows:

- a. Defendants' opposition to United States' Motion for Sanctions and Memorandum in Support (ECF No. 52) shall be due on or before November 6, 2024.
- b. Plaintiff's reply in support of United States' Motion for Sanctions (ECF No. 52) shall be due on or before November 20, 2024.

Good cause exists to extend time to modify the briefing schedule for the United States' Motion for Sanctions, including that counsel for the Semenza Defendants was traveling overseas at the time the motion was filed, to accommodate Plaintiff's counsel's deposition schedule, and to

1 provide time for counsel for Defendants to communicate with their clients who live overseas
2 regarding the arguments made in the Motion for Sanctions.

3 The Motion for Sanctions is also about 24-pages in length and contains over 1,000 pages of
4 exhibits. Good cause exists to permit an additional short one-week extension to permit Defendants
5 and their counsel a meaningful opportunity to finalize and file an Opposition.

6 This request will not prejudice any party and the Parties' request is made in good faith and
7 not for the purposes of delay.

8 Respectfully submitted this 30th day of October, 2024.

10 PISANELLI BICE PLLC

U.S. DEPT. OF JUSTICE, TAX DIVISION

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22 IT IS SO ORDERED.



24 UNITED STATES MAGISTRATE JUDGE

25 DATED 10/31/2024